UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) No.: 4:07CR00405-HEA (DDN)
ROBERT DOUGLAS HARTMAN,)
Defendant.	<i>)</i>)

MOTION OF DEFENDANT HARTMAN FOR PRODUCTION OF SPECIFIC BRADY/KYLES MATERIALS

COMES NOW, Defendant Robert Douglas Hartman, by and through the undersigned counsel, and pursuant to *Brady v. Maryland*, 373 U.S. 83 (1963), *Kyles v. Whitley*, 514 U.S. 419 (1995) requests the prosecution produce a list of all the persons, firms and corporations, identified by name and address, with whom Defendant Hartman engaged in transactions as part of the fraud scheme alleged in the indictment. The undersigned has conferred with counsel for the Government about the issues raised in this motion and has a good faith belief and basis to believe that the requested materials exist.

Respectfully submitted,

/s/Burton H. Shostak
Burton H. Shostak, MB#17443
Shostak & Shostak, LLC
8015 Forsyth Boulevard
St. Louis, MO 63105

Telephone: (314) 725-3200 Facsimile: (314) 725-3275

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of August, 2007, a true and correct copy of the foregoing was electronically filed with Clerk of the Court to be served by operation of the Court's CM/ECF electronic filing system upon the following:

Howard J. Marcus

howard.marcus@usdoj.gov~julie.hurst@usdoj.gov;~gretchen.hemm@usdoj.gov;~and~usamoe.crimdock@usdoj.gov

/s/Burton H.	Shostak	
--------------	---------	--